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DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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March 1, 1990

Kimly C. Mangum, P.E.
Mangum Engineering Consultants
388 East Boynton Road
Kaysville, Utah 84037

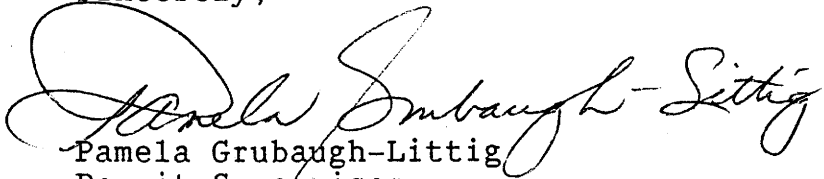
Dear Mr. Mangum:

Re: Initial Completeness Review, Federal Lease Tract Addition, Bear Canyon Mine, Co-Op Mining Company, ACT/015/025, Folder #2, Emery County, Utah

Enclosed is an Initial Completeness Review (ICR) attendant to the Permit Application Package (PAP) for the Federal Lease Tract Addition. Please contact me to clarify any questions concerning the ICR.

I will be forwarding comments from other agencies by March 19, 1990.

Sincerely,



Pamela Grubaugh-Littig
Permit Supervisor

djh
Enclosure(s)
cc:E. Kingston, Co-Op
L. Braxton, DOGM
A. Team, DOGM
AT112/5

INITIAL COMPLETENESS REVIEW
FEDERAL LEASE
BEAR CANYON MINE
ACT/015/025

Co-Op Mining Company
Emery County, Utah

March 1, 1990

UMC 771.25 Permit Fees-(PGL)

The applicant must submit the \$5.00 application fee.

UMC 771.27 Verification of Application-(PGL)

This application is stand-alone, and, therefore, a verification of application must be included.

UMC 782.13 Identification of Interests-(PGL)

Part 2.2.2 incorrectly locates federal lease U-024318 in Section 13, etc. Legal descriptions for federal leases must be properly stated throughout the Permit Application Package (PAP).

UMC 782.14 Compliance Information-(PGL)

(c) An updated listing of each violation, date of issuance, description, etc. (UMC 782.14[c] through UMC 782.14[c][5]) must be submitted for inclusion in the PAP.

UMC 782.18 Personal Injury and Property Damage Insurance Information-(PGL)

The applicant must submit an updated "Certificate of Insurance" for inclusion in the PAP.

UMC 782.19 Identification of Other Licenses and Permits-(PGL)

(b) The address of the issuing authorities must be included on Table 2-2.

UMC 782.21 Newspaper Advertisement and Proof of Publication-(PGL)

A sample of the newspaper advertisement that will be published must be submitted for review that includes the Federal Lease Tract.

UMC 783.12 General Environmental Resources Information-(PGL)

(a) Table 3.4-1 (page 3-27) states that there are 20,804,220 tons of recoverable coal. At an annual production rate of 400,000 tons/year, the mine life is about 52 years. However, the future mining is only shown to the year 2020 (or 30 years). The size, sequence, and timing of the subareas of the land over the estimated total life of mine must be submitted (the appropriate maps must also be submitted; see UMC 783.24[c]).

UMC 783.14 Geology Description-(HS)

The applicant must collect and analyze roof, floor and midseam material at sample site CS-3 (constituents and laboratory methodologies outlined in the Division Guidelines for Management of Overburden and Topsoil, Table 6 [Note: Maximum Acid potential method has changed as follows: U.S. EPA 1978 EPA-660/2-78-054. Method 3.2.6, page 60]) (Plate 3-4). Laboratory results must be forwarded to the Division as soon as possible.

The operator must commit to regularly sample roof, floor and midseam material for acid- and/or toxic-forming potential. The applicant's commitment must include sampling frequency and location, specific parameters and methodology of analysis. In addition, the plan must commit to conduct monitoring on an annual basis or more, if the general location of the mining operations change and this change results in a modification to the quality of the roof, floor and midseam.

UMC 783.19 Vegetation Information-(LMK)

The current vegetation map (Plate 9-1) does not include the entire federal lease area nor does the permit boundary shown on this plate correlate with that shown on Plate 2-1. Please submit a new Plate 9-1 showing the entire federal lease and adjacent area as well as the correct permit boundary. The PAP must also include a general description of each vegetation type within the federal lease area.

UMC 783.20 Fish and Wildlife Information-(LMK)

The numbering of Appendix 10-D (Wildlife Survey Information) (page 10-14) of the lease application will conflict with Appendix 10-D of the approved PAP (Wildlife Mitigation). Please change the number of this appendix.

There is no evidence in the PAP or lease package that indicates whether the new lease was covered by past raptor surveys. Appendix 10-D references a map (Plate 3-3) that was not submitted. Please provide a map or other suitable documentation that would identify the aerial extent of raptor surveys.

UMC 783.22 Land Use Information-(LMK)

Pages 4-2 and 4-3 of the land use section incorrectly identified the Emery County zoning classification as industrial for the permit area (including the new lease area). According to county officials, the permit area, the new lease area, and adjacent areas are zoned as MG-1 and CE-1. The PAP needs to be revised to correctly identify the County zoning classifications and the allowable activities for each area. Also, please provide a landuse map which identifies the different zoning areas.

UMC 783.24 Maps: General Requirements-(PGL)

(a) The identification of "U.S. Gvt." as a subsurface owner on Plate 2-3 should be more specific. Please update Plate 2-3..

(c) The life of mine is projected to be 52 years. Therefore, the size, sequence, and timing to be affected over the estimated total life of the mine and for which additional permits will be sought must be submitted (Plate 3-4 and 3-4a must be revised to reflect this). Will Federal Lease U-024318 be mined during any permit term?

UMC 783.25 Cross Sections: Maps and Plans-(PGL)

(1) The location and extent of known workings of inactive or abandoned underground mines adjacent to the permit area must be depicted.

UMC 784.11 Operation Plan: General Requirements-(PGL)

The applicant must identify the type and method of coal mining for each seam.

UMC 784.12 Operation Plan: Existing Structures-(PGL)

Photographs of all existing structures must be included in the PAP.

UMC 784.13 Reclamation Plan: General Requirements-(PGL)

(b)(6) A copy of the BLM-approved Resource Recovery and Protection Plan must be submitted for inclusion in the PAP.

(b)(9) A copy of the Bureau of Air Quality Approval order allowing the increased production must be submitted for inclusion in the PAP.

UMC 784.19 Underground Development Waste-(PGL)

The applicant currently places underground development waste underground. What is the estimated underground development waste for this federal lease? Will underground development waste continue to be stored underground? Please update PAP accordingly.

UMC 784.20 Subsidence Control Plan-(DD)

A subsidence monitoring plan must be incorporated into the PAP for the federal lease area. Overburden over the lease ranges from 1,500 feet to 2,000 feet. Surface effects from subsidence must be addressed and stations to monitor subsidence must be identified.

UMC 784.26 Air Pollution Control Plan-(HS)

The applicant must submit an updated copy of the Bureau of Air Quality Approval order which includes findings based on the increase in coal production and loading.

djh
AT112/1-4